

EXHIBIT B

ANDREWS KURTH LLP
Paul N. Silverstein (PS 5098)
Jonathan I. Levine (JL 9674)
Abhishek Mathur (AM 1269)
450 Lexington Avenue, 15th Floor
New York, New York 10017
Telephone: (212) 850-2800
Facsimile: (212) 850-2929

*Counsel to the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re:	: Chapter 11
	:
LEXINGTON PRECISION CORP., <u>et al.</u>,	: Case No. 08-11153 (SCC)
	:
	: (Jointly Administered)
Debtors.	:
-----X	

**OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' RESPONSE TO DEBTORS' OMNIBUS REPLY**

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors, Lexington Precision Corporation ("Lexington Precision") and Lexington Rubber Group, Inc. ("LRGI" and, collectively with Lexington Precision, the "Debtors"), for its Response to the Debtors' Omnibus Reply (the "Reply") to Objections to Approval of the Debtors' Proposed Disclosure Statement (the "Proposed Disclosure Statement") in respect of the Debtors' Fourth Amended Joint Plan of Reorganization (the "Proposed Plan"),¹ respectfully represents:

1. The stridence of the Debtors' Reply to the Committee's objection (*See Reply*, ¶ 1) is unfortunate and out of line (given the facts here), but it would not be productive to address

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Proposed Disclosure Statement.

such remarks. The Committee believes that these cases are on their way to a successful resolution. The Committee, however, has a fiduciary obligation to endeavor to make all aspects of such successful resolution fair, reasonable and equitable to all unsecured creditors.

2. The principal focus of the Committee's pleading in respect of the Debtors' proposed disclosure statement is the treatment of Class 17, unsecured creditors of Debtor, LRGI. LRGI is a solvent estate. Its creditors are structurally senior to unsecured claims of the parent Debtor, Lexington Precision Group. Undersigned counsel to the Committee has advised the Committee that Debtors' proposed post-effect date interest rate on deferred payments to Class 17 is woefully inadequate.²

3. It is certainly a reasonable, contrasting datapoint that the post Effective Date interest rate on deferred payments to the Debtors' secured debt, which has a lien on all or substantially all of the Debtors' (including LRGI's) assets is approximately 14.5% per annum.

4. Based on the foregoing, the Committee requests that the letter annexed as Exhibit A be included in the Debtors' solicitation materials.

² Counsel to the Committee has also advised the Committee that post-petition pre-effective date interest rate is too low.

WHEREFORE, the Committee respectfully requests that the Court grant such relief as the Court may deem just and proper.

Dated: New York, New York
May 25, 2010

ANDREWS KURTH LLP

By: /s/ Paul N. Silverstein

Paul N. Silverstein (PS 5098)
Jonathan I. Levine (JL 9674)
Abhishek Mathur (AM 1269)
450 Lexington Avenue, 15th Floor
New York, New York 10017
Telephone: (212) 850-2800
Facsimile: (212) 850-2929

Counsel to the Official Committee of
Unsecured Creditors

EXHIBIT A TO THE SUPPLEMENTAL OBJECTION

The Official Committee of Unsecured Creditors
of Lexington Precision Corp., et al.
c/o Andrews Kurth LLP
450 Lexington Avenue
New York, New York 10017

May [___], 2010

TO: HOLDERS OF GENERAL UNSECURED
CLAIMS AGAINST LEXINGTON RUBBER
GROUP, INC. ("Lexington Rubber") (CLASS 17)

RE: Lexington Precision Corporation, et al., (the "Debtors") Case No. 08-11153 (SCC)

The Official Committee of Unsecured Creditors (the "Committee") has been appointed as your representative in the Debtors' Chapter 11 cases. The Debtors are seeking to obtain confirmation of their Fourth Amended Joint Plan of Reorganization, dated April 19, 2010 [Docket No. 869] (the "Proposed Plan"). The Debtors seek votes on the Proposed Plan from all holders of Class 17 claims (the "Class 17 Claim Holders") against Lexington Rubber.

THE COMMITTEE RECOMMENDS THAT CLASS 17 VOTE AGAINST THE PROPOSED PLAN.

Under the Proposed Plan, Class 17 Claim Holders would be entitled to receive either: (i) a cash payment equal to 51% of their Allowed Claims, or (ii) an initial payment equal to 10% of their Allowed Claims, followed by 9 equal quarterly payments of 10.75% of Allowed Claims (the "Proposed Recovery"). Lexington Rubber is a solvent estate and unsecured claims against Lexington Rubber are structurally senior to unsecured claims at Lexington Precision Corporation. **THE COMMITTEE BELIEVES THAT UNDER THE PROPOSED PLAN, THE PROPOSED RECOVERY FOR CLASS 17 CLAIM HOLDERS IS INADEQUATE**

**BECAUSE, AMONG OTHER THINGS, THE INTEREST RATE ON DEFERRED POST
EFFECTIVE DATE PAYMENTS TO CLASS 17 IS WOEFULLY INADEQUATE.**

The deadline for receipt of the ballots on the Proposed Plan is [_____] , 2010.
The Committee urges you to vote **AGAINST** the Proposed Plan and submit your ballot so that it
is received before [_____] , 2010.

Should you have any questions about this case, the Proposed Plan or the voting process,
please call either Paul N. Silverstein or Jonathan I. Levine at (212) 850-2800, counsel to the
Committee at your convenience.